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*Counsel for Plaintiffs Cedric de Lisser,
 Christopher Moser, and Michael Michelin, in
 their capacity as the Trustees of the Cred
 Liquidation Trust*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

CEDRIC DE LISSER, CHRISTOPHER MOSER,) and MICHAEL MICHELIN, in their capacity as) the Trustees of the Cred Liquidation Trust,) Plaintiffs,) v.) LOCKTON COMPANIES LLC, d/b/a) LOCKTON INSURANCE BROKERS LLC,) a Missouri limited liability company; LOCKTON) COMPANIES, LLC- PACIFIC SERIES, d/b/a) LOCKTON INSURANCE BROKERS LLC, a) Missouri limited liability company; and DOES 1-) 10, inclusive.) Defendants.) _____) _____)	Case No. 3:23-cv-00243-JD [Removal from Superior Court of California, County of San Francisco, Case No. CGC-22603638] SUPPLEMENTAL DECLARATION OF ANGELA J. SOMERS State Action Filed: December 22, 2022 Hearing Date: March 30, 2023 Hearing Time: 10:00 a.m. Pacific
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1 I, Angela J. Somers, pursuant to 28 U.S. Code § 1746, make the following declaration under the
2 penalty of perjury:

3 1. I am an attorney admitted to practice in the State of New York. I am a partner at Reid,
4 Collins & Tsai LLP, counsel to the Trustees (the “Trustees”) of the Cred Inc. Liquidation Trust (the
5 “Trust”) established in the chapter 11 bankruptcy cases of the above-captioned debtors. I am admitted
6 *pro hac vice* in this matter.

7 2. I submit this Supplemental Declaration in support of the Trustees’ *Reply to Defendants’*
8 *Opposition to Motion to Remand or in the Alternative for Equitable Remand*, filed concurrently herewith.

9 3. I have personal knowledge of the facts set forth herein and, if called as a witness, I could
10 and would testify competently to them.

11 4. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of a hearing that
12 took place on July 19, 2022 in Case No. 20-12836 (JTD) in the United States Bankruptcy Court for the
13 District of Delaware.

14 5. Attached hereto as Exhibit 2 is a true and correct copy of the *Memorandum Opinion*,
15 entered by the United States Bankruptcy Court for the District of Delaware in Case No. 20-12836 (JTD),
16 dated February 27, 2023.

17 6. Attached hereto as Exhibit 3 is a true and correct copy of the transcript of a hearing that
18 took place on February 9, 2023 in Case No. 20-12836 (JTD) in the United States Bankruptcy Court for
19 the District of Delaware.

20 7. Attached hereto as Exhibit 4 is a true and correct copy of the *Declaration of Daniel Schatt*
21 *in Support of Debtors’ Chapter 11 Petitions and First Day Motions* filed on November 9, 2020 in Case
22 No. 20-12836 (JTD) in the United States Bankruptcy Court for the District of Delaware.

23 8. I declare that the foregoing is true and correct.

24 Executed in Greenwich, Connecticut on March 10, 2023.

25
26 /s/ Angela Somers
27 Angela J. Somers
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